

EXHIBIT 15

From: [Powell, Dean](#)
To: [Ward, Trenton](#)
Cc: [EXT Britax-Nuna-Team](#); EXT-smoore@kilpatricktownsend.com; [Koballa, Kasey](#); [Adkins, Robin](#); [Specht, Kara](#)
Subject: RE: Britax v. Nuna
Date: Wednesday, May 20, 2020 2:04:05 PM

EXTERNAL Email:

Trenton,

Britax does not oppose Nuna moving the court for the below proposed adjustment of the schedule.

Please be advised that Britax does not intend to take the depositions of Nuna's disclosed expert witnesses. We understand that Nuna intends to take the deposition of Britax's experts. Under FRCP 26(b)(4)(A), Nuna is required to pay for each of the experts' reasonable fees for time associated with responding to discovery, including the attendance and preparation for each of the depositions.

Sincerely,
Dean

Dean Powell

Kilpatrick Townsend & Stockton LLP

1001 West Fourth Street | Winston-Salem, NC 27101-2400

office 336 607 7347 | fax 336 734 2640

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From: Ward, Trenton <Trenton.Ward@finnegan.com>
Sent: Thursday, May 14, 2020 5:18 PM
To: Powell, Dean <DPowell@kilpatricktownsend.com>
Cc: EXT Britax-Nuna-Team <Britax-Nuna-Team@finnegan.com>; Moore, Steve <smoore@kilpatricktownsend.com>; Koballa, Kasey <KKoballa@kilpatricktownsend.com>; Adkins, Robin <RAdkins@kilpatricktownsend.com>; Specht, Kara <Kara.Specht@finnegan.com>
Subject: RE: Britax v. Nuna

Dean,

We have considered your proposal to forgo expert depositions and would prefer to simply move for an extension at this time.

Local counsel informed us that parties seeking extensions before other EDPA Judges based on COVID-19 circumstances have been successful. We feel there is a sufficient and reasonable basis to seek the 8-week extension proposed in our email below. If you agree, we will provide a copy of a proposed joint motion for your review.

Best Regards,
Trenton

From: Powell, Dean <DPowell@kilpatricktownsend.com>
Sent: Monday, May 11, 2020 3:00 PM
To: Ward, Trenton <Trenton.Ward@finnegan.com>
Cc: EXT Britax-Nuna-Team <Britax-Nuna-Team@finnegan.com>; EXT-
smoore@kilpatricktownsend.com <smoore@kilpatricktownsend.com>; Koballa, Kasey
<KKoballa@kilpatricktownsend.com>; Adkins, Robin <RAdkins@kilpatricktownsend.com>; Specht,
Kara <Kara.Specht@finnegan.com>
Subject: RE: Britax v. Nuna

EXTERNAL Email:

Trenton,
We are in receipt of your message. We are conferring with our client.

We can speak tomorrow at 11:30, or we will respond via email before that.

Sincerely,
Dean

Dean Powell
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From: Ward, Trenton <Trenton.Ward@finnegan.com>
Sent: Monday, May 11, 2020 10:57 AM
To: Powell, Dean <DPowell@kilpatricktownsend.com>
Cc: EXT Britax-Nuna-Team <Britax-Nuna-Team@finnegan.com>; Moore, Steve
<smoore@kilpatricktownsend.com>; Koballa, Kasey <KKoballa@kilpatricktownsend.com>; Adkins,
Robin <RAdkins@kilpatricktownsend.com>; Specht, Kara <Kara.Specht@finnegan.com>
Subject: RE: Britax v. Nuna

Dean,
A minor correction, we would be available at 4PM today if that works for you.
thanks, Trenton

From: Ward, Trenton <Trenton.Ward@finnegan.com>
Sent: Monday, May 11, 2020 10:54 AM
To: Powell, Dean <DPowell@kilpatricktownsend.com>

Cc: EXT Britax-Nuna-Team <Britax-Nuna-Team@finnegan.com>; EXT-smoore@kilpatricktownsend.com <smoore@kilpatricktownsend.com>; Koballa, Kasey <KKoballa@kilpatricktownsend.com>; Adkins, Robin <RADkins@kilpatricktownsend.com>; Specht, Kara <Kara.Specht@finnegan.com>

Subject: RE: Britax v. Nuna

Dean,

Nuna would like to propose a joint motion to extend certain deadlines to enable in-person expert depositions by both sides. In the table below, we suggest extending the completion of expert discovery and dispositive motions date by 8 weeks. This would permit us to take the depositions in-person in July and August instead of remotely in May and June.

Let us know if you are available for a meet and confer at 3PM ET today 5/11 to discuss.

Alternatively, we would also be available at 11:30AM on Tuesday 5/12.

Best Regards, Trenton

<u>Deadline</u>	<u>Current Date</u>	<u>Extended Date</u>
Rebuttal Expert Disclosures	May 18, 2020	unchanged
Completion of Expert Discovery	June 12, 2020	August 7, 2020 (+ 8 weeks)
Dispositive Motions Due	July 6, 2020	August 31, 2020 (+ 8 weeks)

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